

Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233

FCC Mail Room

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time. Proposed public access requirements would do so – even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest.

We urge the FCC not to adopt rules, procedures or policies discussed above.

Patricia G. Stewart

Signature

PATRICIA G. STEWART

Name

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3/8/08

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FCC Mail Room

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Deborah Oriol

Signature

Deborah Oriol

Name

Title (if any)

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6.3.08

Date

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Red Cross**

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February 26, 2008

Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Deborah Tate
Commissioner Robert McDowell

Harold W. Brooks
Chief Executive Officer

Federal Communications Commission
445 12th Street, S.W.
Washington DC 20554

Re: *In the Matter of Broadcast Localism* (MB Docket No. 04-233)
Report on Broadcast Localism and Notice of Proposed Rulemaking

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate, and McDowell:

I noted with great interest that the FCC recently issued a Notice of Proposed Rulemaking on broadcast localism. From what I understand, this proceeding is intended to "ensure that broadcasters are appropriately addressing the needs of their local communities." I wanted to be one of the first to tell you that, in my view and in the view of my organization, KGO-TV already serves our community in any number of ways that makes any additional federal regulation unnecessary.

For years, our volunteers have relied on KGO-TV for accurate and detailed emergency and weather information. This information goes far beyond a weather report to include advance warnings of weather emergencies, notifications of evacuation routes, locations of relief stations, and geographically-targeted updates.

It is because of my first-hand experience with such a long-standing partnership that I am curious as to why the FCC deems it necessary to issue additional regulations. In my view, our community already is well-served by KGO-TV and no national regulation could create the kind of great local partnership that we already enjoy.

Sincerely,

Harold W. Brooks

cc: Michelle Carey
Rick Chessen
Rudy Brioche
Amy Blankenship
Cristina Pauze
Monica Desai

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February 22, 2008

Chairman Kevin Martin
Commissioner Michael Copps
Commissioner Jonathan Adelstein
Commissioner Deborah Tate
Commissioner Robert McDowell

Federal Communications Commission
445 12th Street, S.W.
Washington DC 20554

Re: *In the Matter of Broadcast Localism* (MB Docket No. 04-233)
Report on Broadcast Localism and Notice of Proposed Rulemaking

Dear Chairman Martin and Commissioners Copps, Adelstein, Tate, and McDowell:

I understand that the FCC recently issued a Notice of Proposed Rulemaking on broadcast localism out of concern that broadcasters may not be adequately serving their local communities.

I am pleased to say that the Office of Women's Health has been very impressed with KABC-TV's responsiveness ever since we first approached them in 1999 (shortly after our office's inception) for coverage of the launch of our cervical cancer pilot program targeting low income, underserved women. Health reporter Denise Dador and crew came to our office for an interview that was aired and subsequently garnered the interest of the community and no doubt helped our pilot program for free Pap tests become a full-fledged, funded campaign.

Denise Dador served as Mistress of Ceremonies for most of the annual cervical cancer initiative community breakfasts that followed (through 2004), and for nearly every health-related event ever since – most recently an October 2007 community forum to raise awareness of the growing problem of human trafficking. The presence of a recognizable and trusted representative of the media adds significance to such occasions and we have been delighted with KABC-TV's support.

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MAR 11 2008

Federal Communications Commission
Office of the Secretary

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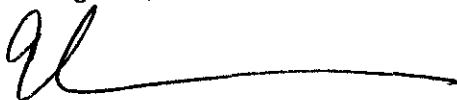
Not only have we been able to utilize their impassioned health reporter for our events and also receive television coverage, we have worked with KABC-TV in a number of other ways:

- Over the last two years, our office and KABC-TV and their other community partners developed the *ABCs of Women's Health* – a glossy 20 page year-by-year guide to staying healthy which they produced for us for mass distribution, first in English and then a Spanish version was added in 2007. In an attempt to reach underserved women, another language will be added for the next edition due out in October 2008.
- We attend regular monthly meetings with the KABC-TV team to find ways to promote community wellness and enhance the activities of their annual women's health month.
- We participate in their Women of Courage luncheon each October, honoring women in the community who have overcome substantial obstacles and made a difference in the lives of others or have made a significant impact on improving the lives of women.
- KABC-TV was a co-sponsor of our 2007 Women's Health Policy Summit: *Building Multicultural Women's Health: Setting an Agenda for Los Angeles*. Denise Dador was the MC and KABC-TV produced a twelve minute DVD of local women's health leaders addressing the issue of health disparities in women of color. The DVD was shown at the summit and given out to the 435 summit participants. It is also given to funders, legislators and other healthcare stakeholders to draw attention to the need for health equity.

The Office of Women's Health receives ongoing support from KABC-TV for our activities and we enjoy a very productive working relationship that has been of tremendous benefit to us and to the community of low-income, underserved women we serve.

We see absolutely no need for further regulation as KABC-TV is already exceptionally community-committed.

Best regards,



Ellen Eidem, M.S.
Director, Office of Women's Health

Cc: Michelle Carey
Rick Chessen
Rudy Brioche
Amy Blankenship
Cristina Pauze
Monica Desai

Teresa Samaniego, KABC-TV